

1 Your Name:

John, Theresa, Renee Reichlin

2 Address:

2355 morehead rd, Crescent city, CA

3 Phone Number:

(707) 458-9201 / (707) 487-0693

95531

4 Fax Number:

FILED

5 E-mail Address:

NOV 25 2014

6 Pro Se Plaintiff

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

United States District Court

NJV

Northern District of California

CV 14 5213

Case Number: [leave blank]

John, Theresa, Renee
Reichlin

Plaintiff(s),

COMPLAINT

14 vs.

Del Norte County Department
of health and human services

DEMAND FOR JURY TRIAL

Yes ☐ No ☒

19 Defendant(s).

21 **1. Parties in this Complaint**22 **a. Plaintiff(s).** Write your name, address, and phone number. If there are other
23 *plaintiffs, use more pages to include their names, addresses, and phone numbers.*

24 Name: John Reichlin

25 Address: 2355 morehead rd crescent city, CA
26 95531

27 Phone number: (707) 218-0486

COMPLAINT

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plaintiffs cont.

Theresa Reichlin
2355 morehead Rd.
crescent city, CA
95531 (707) 218-4676

Benee Reichlin
2355 morehead rd.
crescent city, CA
95531 (707) 458-9201

b. **Defendant(s).** Write the full name and address of every defendant. If the defendant is a corporation, write the state where it is incorporated and the state where it has its main place of business. Use more pages if you need to.

Defendant 1:

Name: Del Norte County dept. of Health & Human Services.

Address: 880 Northcrest drive.

Crescent City, CA 95531

Defendant 2:

Name: Open Door Community Health Centers.

Address: 550 e. Washington Blvd. (Dr. Warren Rhenwaldt.)

Crescent City, CA 95531

Defendant 3:

Name: Candace Audworth

Address: 252 North St

Smith River, CA

Defendant 4:

Name: _____

Address: _____

2. Jurisdiction

Usually, only two types of cases can be filed in federal court: cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.

☒ My case belongs in federal court under federal question jurisdiction because it is about federal law(s) or right(s).

Which law(s) or right(s) are involved? 1, 6, 1X, X

☒ My case belongs in federal court under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants AND the amount of damages is more than \$75,000.

COMPLAINT

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3. Venue

This Court can hear cases arising out of Alameda, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco, San Mateo, and Sonoma counties. This is the right court to file your lawsuit if 1) All defendants live in California AND at least one of the defendants lives in this district; OR 2) A substantial part of the events you are suing about happened in this district; OR 3) A substantial part of the property that you are suing about is located in this district; OR 4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because we reside in Del Norte
all defendants live in California, we are suing
a federal agency.

4. Intradistrict Assignment

There are three divisions of this Court: San Francisco/Oakland, San Jose, and Eureka. The San Francisco/Oakland division covers Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Sonoma counties. The San Jose division covers Monterey, San Benito, Santa Clara, Santa Cruz counties. The Eureka division covers Del Norte, Humboldt, Lake, Mendocino counties, only if all parties consent to a magistrate judge. Explain which division your case should be assigned.

This lawsuit should be assigned to [Select one: San Francisco/Oakland, San Jose, OR Eureka] Division of this Court because EUREKA division
is closest to where we reside

5. Statement of Facts and Claims

Write a short and simple description of the facts of your case. Include WHERE and WHEN the events happened, WHO was involved, WHAT role each defendant played, and HOW you were harmed. If you know which laws or rights the defendant violated, you can include them, but you do not need to make legal arguments. Put each fact or claim into a separate, numbered

1
 2 SA Our complaint with the IHSS department
 3 ~~is~~ not only were the social workers within the
 4 department cold and unsympathetic, they
 5 repeatedly denied us access to documentation
 6 under California state laws. For what
 7 reason? The department scheduled mandatory
 8 appointments ~~for~~ to see if the hours were
 9 being met they failed to show for home
 10 visit rescheduled failed to show again
 11 The program is unorganized and have
 12 not shown to be very competent in
 13 making sure clients are receiving the
 14 care necessary.
 15 So as a employee within the state she Candace
 16 Cudworth is a mandated reporter, why she
 17 was not treated sooner is unknown and also
 18 wrong. Our mother suffered at the hands of
 19 the person who was supposed to be caring
 20 for her. Her lesions were longstanding w/ scabs
 21 and hair. Obviously her hygiene was not kept.
 22 Her nutritional state was poor. what did
 23 she do the hours she was there. if her nutrition
 24 and hygiene were poor and minimal?
 25 So Our complaint with Dr. Warren Rheubaldt
 26 is as her M.D. to our understanding he should
 27 be involved in her case management making
 28 sure she is receiving the care necessary

29. We asked for medical records but were denied. We
 - asked to speak with Dr. Rheuwaldt but were
 31. unable to.
 32. SD. We were never notified once of her poor care.
 33. or health. We had the right to know of
 34. the pain she was suffering so we could get
 35. medical help.
-

1 **6. Demand for Relief**

2 State what you want the Court to do for you. For example, depending on which claims
3 you raise, it may be appropriate to ask the Court to award you money or order the defendant to
4 do something or stop doing something. If you are asking for money, you can say how much you
5 are asking for and why you should get that amount.

6 ~~UNDER MAXIMUM RULE IS \$500 PER DAY~~
7 ~~ALL PARTIES~~

8 UNDECIDED BUT MAX

9 ALLOWED FOR EVERY
10 PARTY INVOLVED, FOR

11 THE PARTIES INVOLVED

12 TO BE REPRESENTED. (ETC)

13 and for a closer look to

14 be given to the IHSS

15 department & standards.

16 also release of all
17 medical records.

18 **7. Demand for Jury Trial**

19 Check this box if you want your case to be decided by a jury, instead of a judge.

20 ☐ Plaintiff demands a jury trial on all issues.

21 All plaintiffs must sign, date, and print their names at the end of the Complaint. Attach
22 another page if you need to.

23 Respectfully submitted,

24 Date: NOV 1. 2014

25 Sign Name:

26 John Reichlin

27 Print Name:

28 John Reichlin

Theresa Aldrich Reichlin
Theresa Aldrich Reichlin

Renee Reichlin

Renee Reichlin